

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ENERRA CORPORATION,

Plaintiff,

vs.

CONTI GROUP LLC, PLASTIKGAS LLC,
ROBERTO CONTI, JULIE CONTI, JORDAN
CONTI, ,

Defendants.

Civil Action No. 3:23-cv-00194-L

Honorable Sam A. Lindsay

JURY TRIAL DEMANDED

CONTI GROUP, LLC,

Counter-Plaintiff,

vs.

ENERRA CORPORATION, SERGIO PEREZ,
MARK MILLS AND MICHAEL BROWN,

Counter-Defendants.

AGREED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

The Parties¹ are engaged in the discovery process. Portions of information to be produced during discovery may be considered by one of the Parties to be confidential and/or proprietary in nature. To that end, the Parties have agreed to terms under which such materials may be marked as confidential, the process by which such materials will be protected from further disclosure, and related procedural matters. Attached as Exhibit A is a copy of the Agreed Protective Order sought to be entered by the Parties to this litigation.

¹ The term “Parties” includes: 1) Plaintiff Enerra Corporation (“**Plaintiff**”) and Defendants Conti Group, LLC, PlastikGas, LLC, Roberto Conti, Julie, Conti, and Jordan Conti (collectively “**Defendants**”); and 2) Conti Group, LLC as Counter-Plaintiff and Counter-Defendants Sergio Perez, Mark Mills, and Michael Brown.

Dated: August 7, 2023

Respectfully submitted,

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